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June 25, 2020

VIA ECF

The Honorable Gregory H. Woods  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: United States v. Natalie Mayflower Sours Edwards, 19 Cr. 64 (GHW)

Dear Judge Woods:

We write in response to the Court's June 24, 2020, Order scheduling a June 29, 2020, conference to address the issues raised in Dr. Sours Edwards' ex parte submission to the Court. There is one concern that counsel and the government would like to raise before the conference. In her submission, Dr. Sours Edwards makes several statements regarding her relationship with counsel. Although the government has not yet seen the submission, we have discussed the general nature of certain issues raised in the submission. After conferring, both counsel and the government agree that, in an abundance of caution, this Court should consider appointing independent counsel for Dr. Sours Edwards prior to the conference for the limited purpose of conferring with Dr. Sours Edwards about her submission and any issues she has regarding her relationship with current counsel. Together, this independent counsel and current counsel can address all potential issues raised by Dr. Sours Edwards' submission.

Respectfully submitted,

*Jacob Kaplan*

Jacob Kaplan, Esq.

cc: Government Counsel (via ECF)